

STATE OF CALIFORNIA
(Revised 7/24/2002)

CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

To request a Time Extension (TE) or Alternative Diversion Requirement (ADR), please complete and sign this request sheet and return it to your Office of Local Assistance (OLA) representative at the address below, along with any additional information requested by OLA staff. When all documentation has been received, your OLA representative will work with you to prepare for your appearance before the Board. If you have any questions about this process, please call (916) 341-6199 to be connected to your OLA representative.


Mail completed documents to:

California Integrated Waste Management Board
Office of Local Assistance, (MS 25)
1001 I Street
PO Box 4025
Sacramento CA 95812-4025

General Instructions:

For a Time Extension complete Sections I, II, III-A, IV-A, and V.

For an Alternative Diversion Requirement complete Sections I, II, III-B, IV-B and V.

Section I: Jurisdiction Information and Certification <i>All respondents must complete this section.</i>			
I certify under penalty of perjury that the information in this document is true and correct to the best of my knowledge, and that I am authorized to make this certification on behalf of:			
Jurisdiction Name City of Tustin		County Orange	
Authorized Signature 		Title Administrative Services Manager - Dept. of Public Works	
Type/Print Name of Person Signing Joe Meyers	Date 08-18-04	Phone (714) 573-3173	
Person Completing This Form (please print or type) Joe Meyers		Title Administrative Services Manager - Dept. of Public Works	
Phone (714)573-3173	E-mail Address jmeyers@tustinca.org		Fax (714)734-8991
Mailing Address 300 Centennial Way	City Tustin	State CA	ZIP Code 92780

Section II—Cover Sheet

This cover sheet is to be completed for each Time Extension (TE) or Alternative Diversion Requirement (ADR) requested.

1. Eligibility

Has your jurisdiction filed its Source Reduction and Recycling Element, Household Hazardous Waste Element, and Nondisposal Facility Element with the Board (must have been filed by July 1, 1998 if you are requesting an ADR)?

☐ No. If no, stop; not eligible for a TE or ADR.

☒ Yes. If yes, then eligible for a TE or ADR.

2. Specific Request and Length of Request

Please specify the request desired.

☒ Time Extension Request

Specific years requested 2

Is this a second request? ☐ No ☒ Yes Specific years requested. 2004 and 2005

(Note: Requests for an additional extension will need to address why the jurisdiction's efforts to meet the 50% goal by the end of the first extension were not successful.)

☐ Alternative Diversion Requirement Request (*Not allowed for Regional Agencies*).

Specific ADR requested %, for the years .

Is this a second ADR request? ☐ No ☐ Yes Specific ADR requested %, for the years .

(Note: Requests for an additional ADR will need to address why the jurisdiction's efforts to meet 50% by the end of the first ADR period were not successful.)

Note: Extensions may be requested anytime by a jurisdiction, but will only be effective in the years from January 1, 2000 to January 1, 2006. An original request for a TE/ADR may be granted for any period up to three years and subsequent requests for TE/ADR may extend the original request or be based on new circumstances but the total number of years for all requests cannot total more than five years or extend beyond January 1, 2006.

Section IIIA—TIME EXTENSION

Within this section, discuss your jurisdiction's progress in implementing diversion programs that were planned to achieve 50%. Provide any additional information that demonstrates "good faith effort." The CIWMB shall determine your jurisdiction's progress in demonstrating "good faith effort" towards complying with AB 939. Note: The answers to each question should be comprehensive and provide specific details regarding the jurisdiction's situation.

Attach additional sheets if necessary—please reference each response to the appropriate cell number (e.g., IIIA-1).

- 1. Why does your jurisdiction need more time to meet the 50% goal? Describe why SRRE selected programs did not achieve 50% diversion. Identify barriers to meeting the 50% goal and briefly indicate how they will be overcome.**

See attached sheets

- 2. Why does your jurisdiction need the amount of time requested? Describe any relevant circumstances in the jurisdiction that contribute to the need for a Time Extension.**

See attached sheets

- 3. Describe your jurisdiction's Good Faith Efforts to implement the programs in its SRRE.**

See attached sheets

- 4. Provide any additional relevant information that supports the request.**

See attached sheets

Section IIIB—ALTERNATIVE DIVERSION REQUIREMENT

Within this section, discuss your jurisdiction's progress in implementing diversion programs that were planned to achieve 50%. Provide any additional information that demonstrates "good faith effort." The CIWMB shall determine your jurisdiction's efforts in demonstrating "good faith effort" towards complying with AB 939. Note: The answers to each question should be comprehensive and provide specific details regarding the jurisdiction's situation.

Attach additional sheets if necessary—please reference each response to the appropriate cell number (e.g., IIIB-1.).

1. Why does your jurisdiction need and Alternative Diversion Requirement? Describe why SRRE selected programs did not achieve 50% diversion. Identify barriers to meeting the 50% goal and briefly indicate how they will be overcome.

2. Why is your jurisdiction requesting an Alternative Diversion Requirement in lieu of a Time Extension?

3. Describe your jurisdiction's Good Faith Efforts to implement the programs in its SRRE.

4. Describe any relevant circumstances in the jurisdiction that contribute to the need for an ADR. Provide any relevant information that supports the request.

Section IV A—PLAN OF CORRECTION

A Plan of Correction is required by PRC Section 41820(a)(6)(B). The plan is fundamentally a description of the actions the jurisdiction will take to meet the 50% goal by the expiration of the Time Extension.

Attach additional sheets if necessary.

Residential %		17	Non-residential %		83
PROGRAM TYPE Please use the Board's Program Types. The Program Glossary is online at: www.ciwmb.ca.gov/LGCentral/PARIS/Codes/Reduce.htm	NEW or EXPAND	DESCRIPTION OF PROGRAM	FUNDING SOURCE	DATE FULLY COMPLETED	ESTIMATED PERCENT DIVERSION
2000-RC-CRB Residential Curbside Mixed Recyclables	Expand	To address the barriers of contamination and lower participation rates, the City is proposing to continue to monitor the program with aggressive efforts to minimize contamination and maximize resident participation. The City will coordinate with its hauler to perform random quality control inspections for 2% of single family units throughout the year. Homes that are not participating, or that have high levels of contamination, will be contacted in person or by written communication for homes that are unoccupied during working hours. These actions will be followed up by monitoring and follow-up inspections on an as-needed basis. To further address the lower than desirable participation rates, the City will be increasing the level of its residential outreach through brochures and quarterly news releases on the status of its residential programs. The periods after the distribution of printed materials to the residents will be monitored to verify increased participation and/or reduced rates of contamination. Finally, as part of the solution to reducing any existing confusion over the program, the City has directed its hauler to replace signage on inspected, damaged, exchanged, and or, replaced carts with new updated recycling and user signage	Refuse Rate	December 31, 2005	.5%
2000-RC-CRB Residential Greenwaste	Expand	Same as above	Refuse Rate	December 31, 2005	.5%

2030-RC-OSP Commercial On-Site Pick up	Expand	City has identified that more time and assistance is required in order to fully implement the commercial recycling portion of its proposed Plan of Correction (POC). Specific barriers identified are (1) a lack of a specific implementation plan that systematically targets the largest businesses in the City and, (2) inadequate staff resources at both the City and the hauler level to adequately provide technical assistance and program development. At the current level of diversion it would appear that an additional 320 bins need to be placed to divert a total of 1,600 tons per year. This would be a total of 480 bins out of a total of 650 commercial accounts in service throughout the City. The hauler has agreed with the City that additional staffing resources are required to fully implement the plan and is dedicating a full-time employee to commercial recycling program development. The City has also identified that the hauler needs more City support when first approaching businesses to enroll them in a recycling program. City staff will be working with the hauler in making more initial contacts throughout the commercial sector. The process for identifying additional accounts will begin with the largest 30 commercial generators. The process of selection will continue with the next 30 largest and continue until City staff and CIWMB are satisfied that all feasible accounts have been identified and that bins have been placed with appropriate training and monitoring.	Refuse Rate	December 31, 2005	2%
4060-SP-CAR	Expand	The program has encountered several barriers that prevented the program from achieving the diversion levels identified in the first time extension. The result of these barriers has been a partial application of the intent of the original ordinance. The City proposes a solution that a revised ordinance be prepared with more detailed recycling requirements and be submitted to the City Council for approval in February of 2005. The City is committed to devote sufficient staff resources	Developer	December 31, 2005	3%
8000-TR-WT	Expand	Before additional commercial tonnage is delivered for transformation the City would propose that its commercial 2030-RC-OSP be fully implemented along with its other diversion programs in accordance with the CIWMB hierarchy of reduce, reuse, recycle, transformation, and disposal. If the additional diversion programs do not provide the necessary diversion level then the City will explore the reliability of directing the required amount of waste to the SERRF facility.	Refuse Rate	December 31, 2005	2%
7000-FR-MRF	New	Program 7000-FR-MRF is now the applicable program that best addresses the City's Multifamily program. The recyclables collected from this program will be delivered to Sunset Environmental for transfer to Potential Industries for MRFing. The residue from the program will be sent to the Long Beach SERRF WTE as part of program 8000-TR-WTE.	Refuse Rate	December 31, 2005	2%
Total Estimated Diversion Percent From New and/or Expanded Programs					10%
Current Diversion Rate Percent From Latest Annual Report					46%
Total Planned Diversion Percent Estimated					56%

PROGRAMS SUPPORTING DIVERSION ACTIVITIES			
PROGRAM TYPE	NEW or EXPANDED	DESCRIPTION OF PROGRAM	DATE FULLY COMPLETED
2030-RC-OSP Multifamily	Expanded	Beginning August 1, 2004, the City's franchise hauler will begin collecting Multi-Family mixed recycling separately to track tonnage from business / industrial sources. The City will study this data to identify and develop potential programs.	Ongoing
5020-ED-OUT	Expanded	<p>The City will continue to expand education efforts to discourage green waste disposal in trash bins through the distributed of the green waste recycling program brochure sent to landscapers and all commercial customers. A very focused and consistent effort should produce very tangible results.</p> <p>The hauler consistently promotes recycling and source reduction at various community events such as the Spring Egg Hunt, Business Expo, Chili Cook Off/Street Fair, Concerts in the Park, Broadway in the Park, Tiller Days, Dinosaur Dash, Christmas Tree Lighting and numerous other community events by providing source separation containers.</p> <p>The hauler will also continue to educate the Public through public a public education booth at various City-wide events and now has a communications coordinator to help maintain these ongoing efforts.</p> <p>The hauler also offers tours of waste facilities to community groups and provides technical assistance to commercial customers.</p> <p>The City has also placed recycling collection containers throughout it park and recreation areas-</p>	Ongoing
5020-ED-PRN	Expanded	<p>The City's franchise hauler also now distributes single-family, multi-family, commercial business and green waste recycling program brochures twice annually. Each brochure clearly describes each program and the different materials residents and businesses can recycle.</p> <p>Brochures are distributed via mail, door-to-door, site visits to property managers, community group meetings, presentations, community events and at City Hall.</p>	Ongoing
6010-PI-EIN	Expanded	The City will perform spot follow up checks with commercial business customers to be certain that refuse service reductions are occurring in accordance with the impact of recycling activities. The purpose of the monitoring activities is to insure that the economic benefits of reduced disposal bills is passed onto the participating businesses. This will create a positive economic incentive in addition to the reduced collection rates for recycling bins.	Ongoing

Section IV B—GOAL ACHIEVEMENT

Goal Achievement describes the activities the jurisdiction will use to achieve the ADR.
Attach additional sheets if necessary..

Residential %		Non-residential %			
PROGRAM TYPE	NEW or EXPAND	DESCRIPTION OF PROGRAM	FUNDING SOURCE	DATE FULLY COMPLETED	ESTIMATED PERCENT DIVERSION
Please use the Board's Program Types. The Program Glossary is online at: www.clwmb.ca.gov/LG/Centra/PARIS/Codes/Reduce.htm					
Total Estimated Diversion Percent From New and/or Expanded Programs					
Current Diversion Rate Percent From Latest Annual Report					
Total Planned Diversion Percent Estimated					

PROGRAMS SUPPORTING DIVERSION ACTIVITIES

PROGRAM TYPE	NEW or EXPAND	DESCRIPTION OF PROGRAM	DATE FULLY COMPLETED

Section V – PARIS

Office of Local Assistance staff will be reviewing your Jurisdiction's Planning Annual Report Information System (PARIS) database printout as part of the evaluation of your request. Should the Jurisdiction have updates or revisions to the program implementation from the latest Annual Report submitted to the Board, please attach to the application the Jurisdiction's PARIS database printout showing updates or revisions.

Contact your Office of Local Assistance Representative at (916) 341-6199 for a copy of PARIS, or go to the Board's website at www.ciwmb.ca.gov/LGCentral/PARIS/.

Section IIIA. 1.

The City of Tustin received board approval of its first time extension in the fall of 2002. As described in the City's Annual Report, the majority of these programs have been implemented. The City believes that an aggressive implementation of its existing SRRE programs along with the additional efforts noted in this second time extension will result in the attainment of the City's diversion mandate.

The City has experienced several barriers in the implementation of its Plan of Action that will require additional time to resolve. The accompanying text describes each program's level of attainment, the barriers encountered, and the solutions developed and proposed for a second 1066 time extension.

Programs 3000-CM-RCG and 2000-RC-CRB each projected an additional diversion of 0.5% of the City's waste (both programs were to divert a total of approximately 800 tons from the annual 80,000 tons disposed.) The implementation of these residential curbside programs has achieved significant results. Collection of newspaper, glass, plastic and other recyclable materials in a single stream program has been successfully implemented and is currently diverting 4800 tons per year. The collection of residential green waste is diverting an additional 6000 tons per year. Although the franchised hauler has dedicated sufficient trucking and driver resources to fully service the residential curbside programs, the City has not achieved its full goals with the program due to contamination issues and a lower participation rate than is desired. The current participation rate on a monthly basis as reported by the hauler is approximately 50%. The effectiveness of measuring the participation rate during the first time extension needs to be improved, as does the recording of the number of setouts that are too contaminated for collection.

The City has identified that more time and assistance is required in order to fully implement the residential recycling portion of its proposed Plan of Correction (POC). To address the barriers of contamination and lower participation rates, the City is proposing to continue to monitor the program with aggressive efforts to minimize contamination and maximize resident participation. The City will coordinate with its hauler to perform random quality control inspections for 2% of single family units throughout the year. Homes that are not participating, or that have high levels of contamination, will be contacted in person or by written communication for homes that are unoccupied during working hours. These actions will be followed up by monitoring and follow-up inspections on an as-needed basis.

To further address the lower than desirable participation rates, the City will be increasing the level of its residential outreach through brochures and quarterly news releases on the status of its residential programs. The periods after the distribution of printed materials to the residents will be monitored to verify increased participation and/or reduced rates of contamination. Finally, as part of the solution to reducing any existing confusion over the program, the City has directed its hauler to replace signage on inspected, damaged, exchanged, and or, replaced carts with new updated recycling and user signage.

In addition to the specific barriers and solutions identified above, the City has also identified that a lack of regular communication with respect to reporting and monitoring of the hauler's effort has acted as a barrier to fully implementing the program as originally designed. As a remedy, the hauler and the city have established a bi-monthly reporting system. These reports will be forwarded monthly to the OLA staff administering the city's 1066 POC so all parties can be current on the status of implementation.

Program 2030-RC-OSP projected an additional diversion of 2%, or 1,600 tons/year. Collection of cardboard, newspaper, glass, and other recyclable materials at commercial 3-yard bin locations throughout the City would achieve the diversion. Although the franchised hauler was able to place 160 bins by mid-2004, the pace of implementation was not sufficient to achieve the planned level of diversion. The current annual tonnage diverted through the 160 bins is approximately 520 tons. This diversion is accomplished by a dedicating one front loader route that operates four days per week. The 160 bins have been divided into two routes of 80 bins per route and each account is collected two times per week. The City has identified that more time and assistance is required in order to fully implement the commercial recycling portion of its proposed Plan of Correction (POC). Specific barriers identified are (1) a lack of a specific implementation plan that systematically targets the largest businesses in the City and, (2) inadequate staff resources at both the City and the hauler level to adequately provide technical assistance and program development. At the current level of diversion it would appear that an additional 320 bins need to be placed to divert a total of 1,600 tons per year. This would be a total of 480 bins out of

a total of 650 commercial accounts in service throughout the City. The hauler has agreed with the City that additional staffing resources are required to fully implement the plan and is dedicating a full-time employee to commercial recycling program development. The City has also identified that the hauler needs more City support when first approaching businesses to enroll them in a recycling program. City staff will be working with the hauler in making more initial contacts throughout the commercial sector. The process for identifying additional accounts will begin with the largest 30 commercial generators. The process of selection will continue with the next 30 largest and continue until City staff and CIWMB are satisfied that all feasible accounts have been identified and that bins have been placed with appropriate training and monitoring.

As with the residential recycling component, the City has identified that a lack of reporting and monitoring of the hauler's effort by City staff has acted as a barrier to fully implementing the program as originally designed. As a remedy the hauler and the city have established a bi-monthly reporting system. These reports will be forwarded monthly to the OLA staff administering the city's 1066 POC so all parties can be current on the status of implementation. Although the current diversion rate indicates that each account only produces 67 pounds per collection based on twice weekly collection, it is likely that targeting larger generators will result in higher collection amounts. City staff will work with CIWMB staff as the monitoring proceeds to identify a more reliable diversion rate for this program.

In addition to the monitoring efforts described above the City will also work with its hauler to monitor the level of refuse service reduction that is realized with the introduction of the recycling bins. The hauler will provide, on a monthly basis, a list of all recycling commercial accounts by their level of service and the anticipated reduction in solid waste collection. The list will include customer name, location, equipment deliveries and removals and a contact person for each account. The City will perform spot follow up checks with the customers to be certain that refuse service reductions are occurring in accordance with the impact of the recycling activities. The purpose of the monitoring activities is to insure that the economic benefits of reduced disposal bills is passed onto the participating businesses. This will create a positive economic incentive in addition to the reduced collection rates for recycling bins that is described in supporting program 6010-PI-EIN.

In addition to the business recycling, multifamily bin recycling was previously included as part of the commercial 2030-OSP program. These efforts resulted in a placement of only 35 bins and the multifamily program experienced high contamination levels. Confusion appears to have been created by including the multifamily within the scope of business recycling and has resulted in a dilution of efforts to fully implement business recycling programs. Multifamily diversion efforts in this time extension are being placed in PARIS code 7000-FR-MRF.

Program 7000-FR-MRF is now the applicable program that best addresses the City's Multifamily program. The recyclables collected from this program will be delivered to Sunset Environmental for transfer to Potential Industries for MRFin. The residue from the program will be sent to the Long Beach SERRF WTE as part of program 8000-TR-WTE. Given that roughly 70% of Tustin residents live in Multi-Family complexes, and that the City has been providing recycle bins to on an on-request, voluntary, no-cost basis since 2001 a change in approach is needed. It is estimated that currently less than one out of every 10 residents utilize the mixed recycling bin after it is placed on the property. Currently, there are a total of 31 recycle bins and 25 Green Waste bins on the 255 multi-family properties serviced by the City's hauler. The major hindrances to implementation are the difficulty of setting new bins on a densely planned property and resident participation. In such an environment the MRFin of multifamily waste is likely to provide a higher recovery rate than source separated bins. The City will explore the use of mixed waste MRF's which will guarantee 50% diversion of delivered multifamily waste. Action steps to achieve this program expansion in the multifamily sector will be (1) Solicit preliminary quotes from qualified mixed waste processors, (2) Evaluate the impact on the City's required diversion needs, (3) Review with CIWMB staff the potential approaches, (4) Proceed with additional multifamily mixed waste MRFin on an as-needed-basis. The four steps would be completed within the first six months of the 2005 calendar year and be fully implemented at the end of 2005 time extension. Any additional source separated multifamily diversion will be accomplished after the City is satisfied that a full-scale comprehensive business recycling is completely implemented.

In addition to the placement of the recycling bins throughout the City's commercial sector, the commercial recycling efforts will incorporate one additional component: Select Routing - Segregation of industrial area routes between high/low recyclable material content. The high content recycling routes will be delivered to Sunset Environmental where they will be transferred to Potential Industries for MRFing. Any residue from the MRFing process will be delivered to the SERRF plant and added into the 8000-TR-WTE program diversion.

Program 3020-CM-COG projected an additional diversion of 2%, or 1,600 tons/year. This program has experienced partial success in impacting the City's diversion rate. Commercial and roll off Green Waste diversion by the City's franchised hauler in 2003 was 690 tons or slightly less than 1% of the disposed waste stream. The City has targeted the commercial landscapers with brochures to educate the private landscaping community on the diversion possibilities through use of the Tierra Verde composting facility. These brochures are distributed twice a year to landscape professionals and all commercial customers. The green waste that remains to be diverted consists of the material that is disposed of onsite at office/warehouse developments and retail shopping properties. Two primary barriers to achieving a larger diversion with the program have been identified. First, commercial landscapers that service office and shopping centers usually use on-site trash bins to dispose of their trimmings and clippings. Second, the owners of the commercial malls are resistant to placing an additional bin solely for the use of their landscapers. Their reluctance stems from (1) the perceived loss of space necessitated by placement of an additional three-yard bin dedicated solely to green waste and, (2) a lack of on-site monitoring to insure that the gardeners only use the correct bin. The commercial property managers are limited in their staffing and feel that they have sufficient problems to just make sure that the trash is properly disposed of by their tenants, much less the additional effort required to get green waste in its bin and finally recyclables in their correct bin. The solution to all these barriers is increased training and monitoring by both the hauler and City staff in assisting the property managers in the initial training and program initiation. During the first two months of program implementation it will be necessary to speak with all parties to get the program institutionalized into the normal routines of landscapers and tenants. Once the property managers see support, they usually respond with the needed maintenance management to keep the program functioning as they experience an overall increase in cleanliness and order that recycling programs bring to the areas around trash enclosures.

Finally, as part of the increased monitoring and reporting system, the hauler will begin reporting to the City on a monthly basis the presence of green waste in on-site trash bins. These reports will be the basis for expansion of the program and will be used for scheduling corrective site visits.

Program 4060-SP-CAR projected an additional diversion of 3%, or 2,400 tons per year. The implementation of 4060-SP-CAR has been successful in diverting a total of approximately 675 tons from the franchised waste stream. The program has encountered several barriers that prevented the program from achieving the diversion levels identified in the first time extension. In the course of implanting the new Ordinance, the City has identified internal barriers within the City's administrative function. Although the City adopted a C&D ordinance in October 2003, the administration of the ordinance has proven to require more staff resources than the City anticipated. Additionally, the effective enforcement of the ordinance requires a higher level of coordination between the franchised hauler, the developers, and the contractors than the City had planned for, or expected. The result of these barriers has been a partial application of the intent of the original ordinance. The City proposes a solution that a revised ordinance be prepared with more detailed recycling requirements and be submitted to the City Council for approval in February of 2005. The City is committed to devote sufficient staff resources to training, monitoring and follow through to obtain the 3% diversion level that this program has targeted. In the interim, the City has directed staff to work with the City's building division to work within the confines of the current ordinance to track all building activity. The experiences gained from the tracking will be incorporated into the enforcement of the new ordinance. The preliminary efforts of the City in working with the developers of the former MCAS Tustin (Tustin Legacy) military base have been encouraging in that a reported 70% of the demolition tonnage by weight has been diverted. The City is working with the developers to obtain a more reliable method of tracking the diversion and is incorporating these discussions into the development of the revised ordinance to be adopted by the City in February 2005. Further, these discussions indicate that although Federal Disposal is hauling the majority of the demolition waste, it is being done under separate contract and is not under the City's franchise agreement. Therefore, the

discussions with the contractor take on additional importance given that the Tustin Legacy project will be generating significant amounts of demolition and new construction waste over the next ten years.

Note: The City is considering the implementation of an exclusive franchise agreement for the diversion and removal of demolition waste from the Tustin Legacy site

One barrier identified that inhibited the full implementation of the program was the lack of adequate infrastructure to process mixed C&D roll off loads. Although outlets existed for asphalt, concrete, metals, wood, and metals the requirements for delivery of the materials precluded other than source separated C&D loads from being diverted. As of September 2004, Tierra Verde now has the capability of accepting mixed C&D loads. The City has directed its hauler to fully utilize the new facility and divert roll-off loads to the appropriate C&D facility. The performance of the City's hauler in diverting loads of C&D will be made part of the monthly monitoring meeting for compliance and reporting. In addition, the City will be working with the County of Orange and the OLA CIWMB staff on increasing the C&D infrastructure to a level that can adequately address the continued development of the former MCAS Tustin site.

Program 8000-TR-WTE projected an additional diversion of 5%, or 4,000 tons per year. The implementation of 8000-TR-WTE has been successful in diverting a total of approximately 3,300 tons from the franchised waste stream. According to hauler reports, the current use of the SERRF facility will reach the 4,000 ton level identified in the first time extension. The program has encountered barriers that prevented the program from achieving the diversion levels identified in the first time extension. The City's contract with its hauler identified a 10% transformation component in Section 4.4 Diversion Requirements. The City's hauler misinterpreted the language of the contract and assumed that MRFing and waste-to-energy were interchangeable. The City has clarified the meaning of the contract language with its hauler and is seeing better diversion performance.

Delivery of the commercial tonnage to Sunset Environmental began in 2001. The delivered tonnage is then transferred to the SERRF facility in Long Beach. As indicated above, the current level of delivery to Sunset is sufficient to divert 4,000 tons. Another barrier to increasing delivery of a full 10% of Tustin's waste to SERRF is the City understands that capacity issues can be problematic for significant delivery levels and that Long Beach and others have first rights of waste delivery. Before additional commercial tonnage is delivered for transformation the City would propose that its commercial 2030-RC-OSP be fully implemented along with its other diversion programs in accordance with the CIWMB hierarchy of reduce, reuse, recycle, transformation, and disposal. If the additional diversion programs do not provide the necessary diversion level then the City will explore the reliability of directing the required amount of waste to the SERRF facility.

Section IIIA. 2

Why does your jurisdiction need the amount of time requested? Describe any relevant circumstances in the jurisdiction that contribute to the need for a Time Extension.

The City is requesting a time extension to December 31, 2005. The City believes that the time extension will allow it to oversee the successful implementation of all the programs identified in its time extension request. As part of the implementation strategy the City will require its hauler to have all programs fully implemented by July 1, 2005. Granting the time extension until Dec. 31, 2005, will give the City six months to monitor the results of full implementation and to determine if the City is successfully achieving the 50% diversion requirement.

Section IIIA.3

Describe your jurisdiction's Good Faith Efforts to implement the programs in its SRRE.

The City and the Franchise Hauler have implemented all of the originally listed SRRE programs in addition to commencing others:

<u>PROGRAM CODE</u>	<u>DESCRIPTION</u>	<u>PROGRAM STATUS/COMMENTS</u>
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1000-SR-XGC	<i>Xeriscaping/Grasscycling</i>	<i>Implemented and Ongoing</i>
1010-SR-BCM	<i>Backyard and Composting/Mulching</i>	<i>On-Site Limited to City And School efforts</i>
1020-SR-BWR	<i>Business Waste Reduction Program</i>	<i>Implemented and Ongoing</i>
1030-SR-PMT	<i>Procurement</i>	<i>Implemented and Ongoing</i>
1050-SR-GOV	<i>Government Source Reduction Programs</i>	<i>Implemented and Ongoing</i>
2000-RC-CRB	<i>Residential Curbside</i>	<i>Implemented and Ongoing</i>
2020-RC-BYB	<i>Residential Buy-Back</i>	
2030-RC-OSP	<i>Commercial On-Site Pickup</i>	<i>Implemented and Ongoing</i>
2040-RC-SFH	<i>Commercial Self-Haul</i>	
2070-RC-SNL	<i>Special Collection Seasonal (regular)</i>	<i>Implemented and Ongoing</i>
2090-RC-OTH	<i>Other Recycling</i>	<i>Ongoing effort to identify and implement new and emerging programs.</i>
3000-CM-RCG	<i>Residential Curbside Green waste Collection</i>	<i>Implemented and Ongoing</i>
3010-CM-RSG	<i>Residential Self-haul Green waste</i>	<i>Implemented and Ongoing</i>
3020-CM-COG	<i>Commercial On-Site Green waste Pick-up</i>	<i>Implemented and Ongoing</i>
3030-CM-CSG	<i>Commercial Self-Haul Green waste</i>	<i>Implemented and Ongoing</i>
3060-CM-GOV	<i>Government Composting Programs</i>	<i>Implemented and Ongoing</i>
4020-SP-TRS	<i>Tires</i>	<i>Ongoing evaluation for individual project applications</i>
4030-SP-WHG	<i>White Goods</i>	<i>Implemented and Ongoing</i>
4040-SP-SCM	<i>Scrap Metal</i>	<i>Implemented and Ongoing</i>
4050-SP-WDW	<i>Wood Waste</i>	<i>Implemented and Ongoing</i>
4060-SP-CAR	<i>Concrete/Asphalt/Rubble</i>	<i>Implemented and Ongoing</i>
4090-SP-RND	<i>Rendering</i>	<i>No ongoing activity</i>
5000-ED-ELC	<i>Electronic (radio ,TV, web, hotlines)</i>	<i>Implemented and Ongoing</i>
5010-ED-PRN	<i>Print (brochures, flyers, guides, news articles)</i>	<i>Implemented and Ongoing with expanded efforts</i>
5020-ED-OUT	<i>Outreach (tech assistance, presentations, awards, fairs, field trips)</i>	<i>Implemented and Ongoing</i>
5030-ED-SCH	<i>Schools (education and curriculum)</i>	<i>Implemented and Ongoing</i>
6010-PI-EIN	<i>Economic Incentives</i>	<i>Implemented and Ongoing</i>
6020-PI-ORD	<i>Ordinances</i>	<i>Implemented and Ongoing</i>
7000-FR-MRF	<i>MRF</i>	<i>Implemented and Ongoing</i>
7040-FR-ADC	<i>Alternative Daily Cover</i>	<i>County Program</i>
8000-TR-WTE	<i>Waste To Energy</i>	<i>Implemented and Ongoing</i>
8020-TR-TRS	<i>Tires</i>	<i>Private efforts only – Ongoing evaluation</i>
9000-HH-PMF	<i>Permanent Facility</i>	<i>Ongoing- Pending County initiative</i>
9020-HH-CSC	<i>Curbside Collection</i>	<i>Pending funding availability - ongoing</i>
9030-HH-WSE	<i>Waste Exchange</i>	<i>Ongoing County programs</i>
9040-HH-EDP	<i>Education Programs</i>	<i>Implemented and Ongoing</i>

The programs listed above achieved a diversion rate of 35% in the year 2000. Subsequently, the City entered into new solid waste franchise contract with the City's current hauler. The contract identified new residential and commercial programs not previously identified in the SREE and additional time was required to implement the new programs identified in the new contract. Subsequently, the City received

Board approval of a diversion study indicating that the City's diversion rate had improved to 39% in 2001. By 2002 the diversion rate had risen to 46%.

2000-RC-CRB - Residential Curbside

The City has fully implemented this diversion program and is tracking in 2004 to achieve near-full scale implementation. The recycling programs are publicized in the brochure distributed to all single-family residents bi-annually.

Each year the City's Franchise Hauler conducts random inspections at single-family residents to identify recycling contamination. In cases where contamination was found, residents received a red tag notice and given the Single-Family Recycling Program brochure. The inspections were promoted through a press release sent to the Tustin News. The City's Franchise Hauler then conducted follow-up inspections at the same properties and distributed commuter mugs to residents who performed well in random inspections.

2030-RC-OSP - Commercial On-Site Pickup

In 2004 "driver" route audits have been conducted at 100% of all commercial/industrial customers identifying an additional 30 customers that can utilize a recycle bin. This brought the total placement of commercial recycling bins to 160 bins. The current annual tonnage diverted through the collection of the 160 bins is approximately 520 tons per year. The collection for the program is achieved by dedication of one front loader route that operates four days per week. The 160 bins have been divided into two routes of 80 bins per route and each account is collected two times per week.

2030-RC-OSP - Commercial On-Site Pickup – Multi-Family Complexes

The City has concluded that the source separated multifamily program as currently configured needs a significant programmatic overhaul. Therefore, the multifamily program is being removed from 2030-OSP and is being placed in its own program ***7000-FR-MRF***. The recyclables collected from this program will be delivered to Sunset Environmental for transfer to Potential Industries for MRFing. The residue from the program will be sent to the Long Beach SERRF WTE as part of program 8000-TR-WTE. Given that roughly 70% of Tustin residents live in Multi-Family complexes, and that the City has been providing recycle bins to on an on-request, voluntary, no-cost basis since 2001 a change in approach is needed. It is estimated that currently less than one out of every 10 residents utilize the mixed recycling bin after it is placed on the property. Currently, there are a total of 31 recycle bins and 25 Green Waste bins on the 255 multi-family properties serviced by the City's hauler.

2070-RC-SNL - Special Collection Seasonal (regular)

In addition to a special Christmas Tree Recycling Program ran during the 2001, 2002 and 2003 holiday seasons, the City's Franchise Haulers provided all Tustin residents with two complimentary bulky items pick-ups each year.

3000-CM-RCG - Residential Curbside Green Waste Collection

The residential curbside Green Waste collection program successfully collected 4,168 tons of Green Waste in 2001 and 5,666 tons of Green Waste in 2002. The Green Waste diversion rate in 2001 was 21 percent, which climbed to 27 percent in 2002 and is expected to be even higher for 2003. All households outside of the HOAs have residential green waste curbside service. The residential self-haul green waste program has successfully diverted green waste to the Tierra Verde Composting Facility.

3020-CM-COG - Commercial On-Site Green Waste Pick-up

In 2001 - 2004 a Green Waste recycling program brochure was designed and distributed to all commercial customers (business and multi-family), which advised that Green Waste recycling bins are available free of charge. Additionally, the same brochure was mailed to professional landscapers that included a survey card used to gather important data.

4060-SP-CAR - Concrete/Asphalt/Rubble

The City adopted a C&D ordinance and instituted a Program in October of 2003. The City is collecting and managing the recycling plans submitted by developers and contractors. The City is committed to devote sufficient staff resources to training, monitoring and follow through to obtain the 3% diversion level

that this program has targeted. In the interim, the City has directed staff to work with the City's building division to work within the confines of the current ordinance to track all building activity. The experiences gained from the tracking will be incorporated into the enforcement of the new ordinance. The preliminary efforts of the City in working with the developers of the former MCAS Tustin military base have been encouraging in that a reported 70% of the demolition tonnage by weight has been diverted. The City is working with the developers to obtain a more reliable method of tracking the diversion and is incorporating these discussions into the development of the revised ordinance to be adopted by the City in February 2005. Further, these discussions indicate that although Federal Disposal is hauling the majority of the demolition waste it is being done under separate contract and is not under the City's franchise agreement. Therefore, the discussions with the contractor take on additional importance given that the MCAS Tustin project will be generating significant amounts of demolition and new construction waste over the next ten years. The City will provide CIWMB staff with monthly updates on the progress in developing the C&D program to address the 10 year development of the former Marine air base MCAS Tustin.

5000-ED-ELC - Electronic – (radio, TV, Web, hotlines)

The City's Franchised Hauler provides regular updates to their Web site regarding important program information. The Web site also includes third party recycling sources.

5010-ED-PRN - Print (brochures, flyers, guides, news articles)

The City's Franchise Hauler performed two annual mailings in 2001 - 2003. Prior to this, there was only one mailing done per year. The first included updated recycling program brochures sent to single-family residents, multi-family residents and commercial/business customers. The second included an annual newsletter and/or a flier that emphasized the Christmas Tree Recycling program.

The City's franchised Franchise Hauler has increased its public education efforts by now distributing all Single-Family, Multi-Family, Commercial/Business and Green Waste recycling Program brochures twice per year to each respective targeted audience. Additionally, each month the City's Franchise Hauler utilizes the bottom portion of their invoices to inform commercial customers that recycling bins are available free of charge.

In April 2004 the City's hauler celebrated Earth Day by creating a flier that emphasized recycling, which was distributed during the annual Tustin Chamber of Commerce Business Expo. The flier was also distributed to City Hall, the Chamber of Commerce Office, Library, Senior Center and the Tustin Family & Youth Center.

The City's hauler is providing a complete record of the recycling audits and surveys that have been done over the last few years. The City will be summarizing the data into a useful form that will be utilized to prepare focused outreach efforts to the sectors and program participants that need the most help and technical support.

5020-ED-OUT - Outreach (tech assistance, presentations, awards, fairs, field trips)

In April of 2003 the City's Franchise Hauler hired a full-time communications coordinator to manage all outreach and public education efforts. At the end of 2004 the level of effort provided by the coordinator will be evaluated as to its adequacy. The City will direct the hauler to hire additional staff if needed to fully support the City of Tustin's AB 939 compliance with the mandates of the law. The review of the level of staffing devoted to the diversion programs will be monitored by the City at its monthly progress meetings with its hauler. In addition, with the adoption of its comprehensive C&D ordinance, the City will direct technical outreach to developers, builders, and others in the construction sector to explain the goals and requirements of the City's C&D diversion program.

The City's Franchise Hauler has consistently promoted recycling and source reduction at various community events such as the Spring Egg Hunt, Business Expo, Chili Cook Off/Street Fair, Concerts in the Park, Broadway in the Park, Tiller Days, Dinosaur Dash and Christmas Tree Lighting as well as numerous clean-up efforts throughout the City. The Franchise Hauler also offers tours of waste facilities to community groups and provides technical assistance to commercial customers as part of its normal services.

Tours are also offered by the City's hauler to visit the commingled sorting facility, composting facility and landfill for residents and members of community organizations.

Section IIIA. 4

Provide any additional relevant information that supports this request.

The City and the hauler are significantly expanding the staffing level and focus of the program. The equivalent of 1.0 FTE from the hauler and a similar level of staffing will be provided at the City level. The hauler provides all residents in the City with twice a year, by call, free bulky item service. In addition, the hauler picks up e-waste for a nominal fee.

The City recognizes that it must lead by example. Therefore all City offices will be furnished recycling receptacles and a renewed in-house recycling program will be implemented. In addition, the City has distributed recycling receptacles for bottles and cans next to the trash receptacles at numerous parks and throughout the City. This program was begun in 1997 in City Hall. The program is being expanded with full distribution of containers to all City facilities and will be completed by April 2005.

Finally the City has implemented the following diversion programs that were not in the SRRE:

1. Commingled- recycling carts at small generators
2. Special Event recycling at City sponsored events.
3. Utilization of the Long Beach transformation facility for the disposition of the processing residue from the multifamily MRF program.